UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE

PAMELA C. PHIBBS,

Plaintiff

vs. **No. 3:16-cv-00156-TWP-HBG**

REVENUE RECOVERY CORPORATION and BUFFALOE & VALLEJO, PLC,

Defendants.

PLAINTIFF'S RESPONSES AND OBJECTIONS TO DEFENDANT REVENUE RECOVERY CORPORATION'S FIRST SET OF INTERROGATORIES TO PLAINTIFF

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff Pamela Phibbs (Plaintiff) responds to Defendant Revenue Recovery Corporation's (RRC) First Set of Interrogatories Directed to Plaintiff, as follows:

GENERAL OBJECTIONS

1. Plaintiff objects to each interrogatory to the extent that any portion:

   a. Seeks information protected by the attorney-client privilege, the work-product privilege, or any other privilege, protection, or immunity applicable under the governing law;

   b. Is overly broad, unduly burdensome, oppressive, and/or seeks information not reasonably calculated to lead to discovery of admissible evidence;

   c. Is obtainable from some other source that is more convenient, less burdensome, and less expensive, or to the extent that responding would be oppressive, unduly burdensome or expensive;

   d. Seeks documents that are publicly available or matters of public record or information that is not in Plaintiff's possession, custody or control; and

   e. Is in the custody and control of RRC or obtainable by RRC in the same manner that Plaintiff would obtain responsive information.

EXHIBIT
B

2. These General Objections are made, to the extent applicable, in response to each interrogatory as if the objections were fully set forth herein.

3. Plaintiff responds to each interrogatory based upon information and documentation available on this date. Discovery continues and Plaintiff reserves the right to supplement and amend responses pursuant to the Federal Rules of Civil Procedure.

INTERROGATORIES

1. Identify all person(s) who provided information used in answering these Interrogatories.

ANSWER: Plaintiff and her counsel of record.

2. Identify all person(s) that Plaintiff may call as an expert witness at the trial of this matter and state the subject matter of each expert witness' testimony.

ANSWER: At this time, Plaintiff does not expect calling any expert witnesses at trial except that Plaintiff reserves the right to call any rebuttal experts or experts for impeachment of RRC's witnesses, if necessary.

3. Excluding privileged communications between Plaintiff and her legal counsel, identify all person(s) Plaintiff has communicated with regarding the allegations set forth in the Complaint and/or the event(s) described by the allegations set forth in the Complaint, state the date(s) and time(s) Plaintiff communicated with each such person(s), and state the subject matter of each such communication.

ANSWER: At this time, other than as stated below in the separate paragraphs, Plaintiff does not have exact times for communications other than as shown on documents filed as exhibits to the Complaint and shown on the documents provided in response to RRC's First Request for Production of Documents to Plaintiff, Request No. 1, and each communication clearly shows the subject matter of each such communication.

Plaintiff has communicated with:

(1) RRC since Plaintiff found out, in approximately 2013, that RRC was reporting to Experian, Equifax and TransUnion that Plaintiff owed a debt in the amount of $35,878,91 to Home Federal. Subject matter of each communication by RRC was Plaintiff owed the alleged debt. Subject matter of each communication by Plaintiff was she disputed she owed the alleged debt.

(2) Buffaloe & Vallejo, PLC, in approximately 2015, when it started attempting to collect a debt in the amount of $35,878.91 it alleged Plaintiff owed to Home Federal. Subject matter of each communication by Buffalo, until the collection lawsuit was dismissed, was Plaintiff owed the alleged debt. Subject matter of each communication by Plaintiff was she disputed she owed the alleged debt.

(3) Chancery Court since the collection lawsuit was filed. Subject matter of each communication by Chancery Court was the collection lawsuit had been filed against Plaintiff by Home Federal for a debt in the amount of $35,878.91, until the collection lawsuit was dismissed. Subject matter of each communication by Plaintiff was she disputed she owed the alleged debt.

(4) Experian since approximately 2013 when Plaintiff first found out that RRC was reporting to Experian that Plaintiff owed a debt in the amount of $35,878,91 to Home Federal. Experian communicated to Plaintiff that RRC was reporting she owed the alleged debt. Plaintiff communicated to Experian that she disputed the alleged debt.

(5) Equifax since approximately 2013 when Plaintiff first found out that RRC was reporting to Experian that Plaintiff owed a debt in the amount of $35,878,91 to Home Federal. Experian communicated to Plaintiff that RRC was reporting she owed the alleged debt. Plaintiff communicated to Experian that she disputed the alleged debt.

(6) Equifax since approximately 2013 when Plaintiff first found out that RRC was reporting to Experian that Plaintiff owed a debt in the amount of $35,878,91 to Home Federal. Experian communicated to Plaintiff that RRC was reporting she owed the alleged debt. Plaintiff communicated to Experian that she disputed the alleged debt.

The following individuals, Plaintiff communicated to this person regarding the allegations set forth in the Complaint and/or the event(s) described by the allegations set forth in the Complaint.

(7) Kenneth W. Bushell, 910 Oak Chase Blvd., Lenoir City, TN 37772-6961, [redacted]

(8) Laura Brown, 5508 W. Beaver Creek Dr., Powell, TN 37849-4913, [redacted].

(9) Sabrina Dowdy, 6059 Morganton Rd, Greenback, TN 37742, [redacted].

(10) Amy Dabney, 2220 Steven Dr., Knoxville, TN 37938-4500, phone number currently unknown.

(11) Teresa Haines, 3510 Pebblebrook Way, Knoxville, TN 37921, [redacted].

(12) David Clevenger, 4201 Old Stilesboro Rd, Kennesaw, GA 30152, [redacted].

(13) Kay Weaver, 8033 Paradise Dr., Powell, TN 37849, phone number currently unknown.

(14) Pam Karns, 7843 Bell Rd, Knoxville, TN 37938, [redacted].

(15) Shelia Welch, address currently unknown, [redacted].

(16) Teresa Haines, 3510 Pebblebrook Way, Knoxville, TN 37921, [redacted].

(17) Laura Overstreet, address and phone number currently unknown.

(18) Erika Youngquist, 2807 Highwood Dr, Knoxville, TN 37920, [redacted].

(19) Sean Jeter, 6944 Wyndham Pointe Ln, Knoxville, TN 37931, [redacted].

(20) Teresa Haines, 3510 Pebblebrook Way, Knoxville, TN 37921, [redacted].

(21) B.J. Frye, 4323 Skyline Dr., Apt. #3, Knoxville, TN 37914 [redacted].

(22) Andy Thorn, 245 Winding Way, Mt. Juliet, TN 37122, [redacted].

(23) Brandon McDerman, 910 Newton Ln, Gallatin, TN 37066, [redacted].

(24) Lavanna Luther, PO Box 2141, Clayton, GA 30525, [redacted].

(25) Henry Luther, PO Box 2141, Clayton, GA 30525, currently phone number unknown.

(26) Billy Brown, 243 Emory Church Rd, Kingsport, TN 37664, [redacted].

(27) Rachel Brown, 243 Emory Church Rd, Kingsport, TN 37664, [redacted].

(28) Natalie Stayden, 12516 Settlers Cove Ln, Knoxville, TN 37922, [redacted].

(29) Alfred Wanderlingh, 3528 Schaad Rd, Knoxville, TN 379212, [redacted].

4. State all damages and/or injuries which Plaintiff allegedly suffered as a result of the allegations set forth in the Complaint, including the alleged damages described in Paragraphs 50, 51, and 56 of the Complaint, and state the amount, and method of calculation, of each item of damages Plaintiff seeks from RRC.

ANSWER: At this time, the amount of additional damages (statutory damages) claimed by Plaintiff against RRC in this case are based on the nature of FDCPA violations by RRC in an attempt to collect a debt in violation of the Tennessee statute of limitations for this type of debt and on which debt Plaintiff's personal liability has been discharged, and the extent to which such violation(s) was intentional, resulting in emotional distress suffered by Plaintiff as a direct and proximate result of RRC's intentional and negligent conduct in illegally attempting to collect the debt. Amount of damages are also based upon the FDCPA's strict liability nature. Plaintiff suffered from the sort of damages that would ordinarily flow from the alleged wrong. The precise manner of calculation of these damages amounts will be determined by a jury and Plaintiff will trust the jury to make that determination. Juries are empowered to determine both ultimate liability and damages under this theory of recovery in our system of controversy. Depending upon their particular world views and sense of justice, a jury will either assess liability against RRC or not, and then if liability is found will award damages in accordance with jury instructions provided by the Court after a trial on the merits. The jury instructions in this case have not yet been determined as the final pretrial in this matter has not been held, after which the Court will likely enter an Order which lay out the specific jury instructions to be read to the jury, before, during and after trial. Moreover, the Court has great discretion to enter such orders as necessary to compose jury instructions that will ultimately and properly assist the jury in its determination of damages. Generally, the Court and the parties will be guided in this case by model federal jury instructions, given that the Sixth Circuit has not yet promulgated model civil jury instructions. Also, Plaintiff seeks a judicial determination that RRC is responsible for illegal actions of its collection employees and agents through the doctrine of respondeat superior. The respondeat superior doctrine goes something like this: The acts and omissions of these employee and agent debt collectors were committed within the time and space limits of their agency relationship with their principals. The acts and omissions by these employee and agent debt collectors were incidental to, or of the same general nature as, the responsibilities these agents were authorized to perform by RRC in collecting consumer debts. By committing these acts and omissions against Plaintiff, these employee and agent debt collectors were motivated to benefit their principals and therefore RRC is liable to Plaintiff and the other class members through the doctrine of respondeat superior for the intentional and negligent acts, errors, and omissions done in violation of federal law by its collection employees and agents, including but not limited to violations of the FDCPA, in their attempts to collect the debts from Plaintiff. Finally, Plaintiff reserves the right to amend this response after completion of discovery to include other relevant factors that may be considered by the jury pursuant to 15 U.S.C. § 1692k(b)(2).

At this time, the amount of actual damages claimed by Plaintiff against RRC in this case are based on the nature of FDCPA violations by RRC in an attempt to collect a debt in violation of the Tennessee statute of limitations for this type of debt and on which debt Plaintiff's personal liability has been discharged, and the extent to which such noncompliance was intentional, resulting in emotional distress suffered by Plaintiff as a direct and proximate result of RRC's intentional and negligent conduct in illegally attempting to collect the debt. Amount of damages are also based upon the FDCPA's strict liability nature. Plaintiff suffered from the sort of damages that would ordinarily flow from the alleged wrong. The precise manner of calculation of these damages amounts will be determined by a jury and Plaintiff will trust the jury to make that determination. Juries are empowered to determine both ultimate liability and damages under this theory of recovery in our system of controversy. Depending upon their particular world views and sense of justice, a jury will either assess liability against RRC or not, and then if liability is found will award damages in accordance with jury instructions provided by the Court after a trial on the merits. The jury instructions in this case have not yet been determined as the final pretrial in this matter has not been held, after which the Court will likely enter an Order which lay out the specific jury instructions to be read to the jury, before, during and after trial. Moreover, the Court has great discretion to enter such orders as necessary to compose jury instructions that will ultimately and properly assist the jury in its determination of damages. Generally, the Court and the parties will be guided in this case by model federal jury instructions, given that the Sixth Circuit has not yet promulgated model civil jury instructions. Also, Plaintiff seeks a judicial determination that RRC is responsible for illegal actions of its collection employees and agents through the doctrine of respondeat superior. The respondeat superior doctrine goes something like this: The acts and omissions of these employee and agent debt collectors were committed within the time and space limits of their agency relationship with their principals. The acts and omissions by these employee and agent debt collectors were incidental to, or of the same general nature as, the responsibilities these agents were authorized to perform by RRC in collecting consumer debts. By committing these acts and omissions against Plaintiff, these employee and agent debt collectors were motivated to benefit their principals and therefore RRC is liable to Plaintiff and the other class members through the doctrine of respondeat superior for the intentional and negligent acts, errors, and omissions done in violation of federal law by its collection employees and agents, including but not limited to violations of the FDCPA, in their attempts to collect the debts from Plaintiff. Finally, Plaintiff reserves the right to amend this response after completion of discovery to include other relevant factors that may be considered by the jury pursuant to 15 U.S.C. § 1692k(b)(2).

At this time, the amount of additional damages (statutory damages) claimed by Plaintiff against RRC under the FCRA are based on the nature of FCRA noncompliance by RRC in failing to properly report and failure to request removal of tradelines on Plaintiff's Credit Reports for a debt on which Plaintiff's personal liability has been discharged. Amount of damages are also based upon the FCRA's strict liability nature. Plaintiff suffered from the sort of damages that would ordinarily flow from the alleged wrong. The precise manner of calculation of these damages amounts will be determined by a jury and Plaintiff will trust the jury to make that determination. Juries are empowered to determine both ultimate liability and damages under this theory of recovery in our system of controversy. Depending upon their particular world views and sense of justice, a jury will either assess liability against RRC or not, and then if liability is found will award damages in accordance with jury instructions provided by the Court after a trial on the merits. The jury instructions in this case have not yet been determined as the final pretrial in this matter has not been held, after which the Court will likely enter an Order which lay out the specific jury instructions to be read to the jury, before, during and after trial. Moreover, the Court has great discretion to enter such orders as necessary to compose jury instructions that will ultimately and properly assist the jury in its determination of damages. Generally, the Court and the parties will be guided in this case by model federal jury instructions, given that the Sixth Circuit has not yet promulgated model civil jury instructions. Also, Plaintiff seeks a judicial determination that RRC is responsible for illegal actions of its collection employees and agents through the doctrine of respondeat superior. The respondeat superior doctrine goes something like this: The acts and omissions of these employee and agent debt collectors were committed within the time and space limits of their agency relationship with their principals. The acts and omissions by these employee and agent debt collectors were incidental to, or of the same general nature as, the responsibilities these agents were authorized to perform by RRC in collecting consumer debts. By committing these acts and omissions against Plaintiff, these employee and agent debt collectors were motivated to benefit their principals and therefore RRC is liable to

Plaintiff and the other class members through the doctrine of respondeat superior for the intentional and negligent acts, errors, and omissions done in violation of federal law by its collection employees and agents, including but not limited to violations of the FCRA, in their attempts to collect the debts from Plaintiff. Finally, Plaintiff reserves the right to amend this response after completion of discovery to include other relevant factors that may be considered by the jury pursuant to 15 U.S.C. §1681o and 15 U.S.C. §1681n.

At this time, the amount of actual damages claimed by Plaintiff against RRC under the FCRA are based on the nature of FCRA noncompliance by RRC in failing to properly report and failure to request removal of tradelines on Plaintiff's Credit Reports for a debt she does not owe. Amount of damages are also based upon the FCRA's strict liability nature. Plaintiff suffered from the sort of damages that would ordinarily flow from the alleged wrong. The precise manner of calculation of these damages amounts will be determined by a jury and Plaintiff will trust the jury to make that determination. Juries are empowered to determine both ultimate liability and damages under this theory of recovery in our system of controversy. Depending upon their particular world views and sense of justice, a jury will either assess liability against RRC or not, and then if liability is found will award damages in accordance with jury instructions provided by the Court after a trial on the merits. The jury instructions in this case have not yet been determined as the final pretrial in this matter has not been held, after which the Court will likely enter an Order which lay out the specific jury instructions to be read to the jury, before, during and after trial. Moreover, the Court has great discretion to enter such orders as necessary to compose jury instructions that will ultimately and properly assist the jury in its determination of damages. Generally, the Court and the parties will be guided in this case by model federal jury instructions, given that the Sixth Circuit has not yet promulgated model civil jury instructions. Also, Plaintiff seeks a judicial determination that RRC is responsible for illegal actions of its collection employees and agents through the doctrine of respondeat superior. The respondeat superior doctrine goes something like this: The acts and omissions of these employee and agent debt collectors were committed within the time and space limits of their agency relationship with their principals. The acts and omissions by these employee and agent debt collectors were incidental to, or of the same general nature as, the responsibilities these agents were authorized to perform by RRC in collecting consumer debts. By committing these acts and omissions against Plaintiff, these employee and agent debt collectors were motivated to benefit their principals and therefore RRC is liable to Plaintiff and the other class members through the doctrine of respondeat superior for the intentional and negligent acts, errors, and omissions done in violation of federal law by its collection employees and agents, including but not limited to violations of the FCRA, in their attempts to collect the debts from Plaintiff. Finally, Plaintiff reserves the right to amend this response after completion of discovery to include other relevant factors that may be considered by the jury pursuant to 15 U.S.C. §1681o and 15 U.S.C. §1681n.

At this time, the amount of actual damages claimed by Plaintiff under state law against RRC as a result of the publication of false statements regarding Plaintiff's creditworthiness and Plaintiff's alleged past due account, and punitive damages, are based on the nature of noncompliance by RRC, and the extent to which such noncompliance was intentional, resulting in financial damages and emotional distress suffered by Plaintiff as a direct and proximate result of the publication of false statements regarding Plaintiff's creditworthiness and Plaintiff's alleged past due account. Plaintiff suffered the sort of damages that would ordinarily flow from the alleged wrong. The precise manner of calculation of these damages amounts will be determined by a jury and Plaintiff will trust the jury to make that determination. Juries are empowered to determine both ultimate liability and damages under this theory of recovery in our system of controversy. Depending upon their particular world views and sense of justice, a jury will either assess liability against RRC or not, and then if liability is found will award damages in accordance with jury instructions provided by the Court after a trial on the merits. The jury instructions in this case have not yet been determined as the final pretrial in this matter has not been held, after which the Court will likely enter an Order which lay out the specific jury instructions to be read to the jury, before, during and after trial. Moreover, the Court has great discretion to enter such orders as necessary to compose jury instructions that will ultimately and properly assist the jury in its determination of damages. Generally, the Court and the parties will be guided in this case by model federal jury instructions, given that the Sixth Circuit has not yet promulgated model civil jury instructions. Also, Plaintiff seeks a judicial determination that RRC is responsible for illegal actions of its collection employees and agents through the doctrine of respondeat superior. The respondeat superior doctrine goes something like this: The acts and omissions of these employee and agent debt collectors were committed within the time and space limits of their agency relationship with their principals. The acts and omissions by these employee and agent debt collectors were incidental to, or of the same general nature as, the responsibilities these agents were authorized to perform by RRC in collecting consumer debts. By committing these acts and omissions against Plaintiff, these employee and agent debt collectors were motivated to benefit their principals and therefore RRC is liable to Plaintiff and the other class members through the doctrine of respondeat superior for the intentional and negligent acts, errors, and omissions done in violation of federal law by its collection employees and agents, including but not limited to violations of the FCRA, in their attempts to collect the debts from Plaintiff. Finally, Plaintiff reserves the right to amend this response after completion of discovery to include other relevant factors that may be considered by the jury pursuant to state law.

5. If Plaintiff, Plaintiff's counsel, or anyone else acting on Plaintiff's behalf is in possession or control of any statement(s), either oral or written, by any person(s) regarding, related to or referencing the allegations set forth in the Complaint or the event(s) described by the allegations set forth in the Complaint, state the verbatim contents of each such statement or, in the alternative, attach a copy of each such statement in lieu of providing an answer to this Interrogatory.

ANSWER: At this time, nothing beyond documents produced by Plaintiff in response to RRC's Request for Production of Documents to Plaintiff.

6. With respect to the "second mortgage with Home Federal" referenced in Paragraph 12 of the Complaint, state each and every payment that Plaintiff made to Home Federal, or any other person(s), from October 2005 to the present by stating the date and amount of the payment.

ANSWER: Objection. This request is overly broad, and it is unduly burdensome for Plaintiff to state each and every payment that Plaintiff made to Home Federal, or any other person(s), from October 2005 to the present by stating the date and amount of the payment, and attempts to seek information not relevant to the issues in this lawsuit and is not reasonably calculated to lead to the discovery of admissible evidence. The statute of limitations to commence an action on a deficiency balance for a mortgage debt begins on the date of a trustee's sale. Additionally, this is information that could be more easily be obtained by RRC from its client, Home Federal.

7. State the facts supporting the allegations set forth in Paragraph 15 of the Complaint, that "Upon information and belief the property was foreclosed and sold at substitute trustee's sale on or about February 1, 2011."

ANSWER: The Substitute Trustee's Deed states the sale occurred on February 1, 2011.

8. State the facts supporting the allegations set forth in Paragraph 16 of the Complaint, that "After the debt became allegedly delinquent and after discharge, Home Federal assigned to or hired RRC to engage in collection activity by sending collection letters, making collection calls, and credit reporting, all in an attempt to collect the debt from Plaintiff."

ANSWER: Plaintiff received collection letters from RRC attempting to collect the debt and reviewed her credit reports which showed that RRC was reporting to all 3 **??????** that Plaintiff still owed the debt.

9. With respect to the allegations set forth in Paragraph 19 of the Complaint, that "The May 15, 2015, collection letter was the initial communication by RRC in connection with collection of the debt," state each and every address where you have lived from January 2011 to the present.

ANSWER: Plaintiff has discovered since the filing of this case that she is mistaken. Plaintiff has found a letter from RRC dated March 16, 2011. Plaintiff on information and belief now believes this to be the initial communication.

10. State the facts upon which you base the allegations set forth in Paragraph 21 of the Complaint, that "Defendant RRC had never sent 'previous communications requesting payment.'"

ANSWER: See response to Interrogatory No. 9 above.

11. With respect to the allegations set forth in Paragraph 27 of the Complaint, that "The debt went into default in March 2008 or before; however Plaintiff made some payments up until sometime in 2010," state why Plaintiff made payments after July 7, 2008, and why Plaintiff stopped making payments in 2010.

ANSWER: Plaintiff attempted to continue paying the debts on her mortgages even though the underlying personal debt had been discharged in an attempt to keep her home. This is commonly known as "retain and pay." Due to financial difficulties Plaintiff was unable to continue payments beyond the date of her last payment.

12. State each and every fact in your possession which you believe supports the allegations set forth in Paragraph 29 of the Complaint, that RRC "regularly attempt[s] to collect consumer debts on which the statute of limitations has expired."

ANSWER: At this time, none.

13. State each and every fact in your possession which you believe supports the allegations set forth in Paragraph 30 of the Complaint, that RRC "regularly attempt[s] to collect consumer debts which have been discharged in bankruptcy."

ANSWER: At this time, none.

14. With respect to the allegations set forth in Paragraphs 35 and 36 of the Complaint, state specifically each and every alleged false, deceptive, misleading, or unfair act or practice that Plaintiff claims RRC engaged in.

ANSWER: At this time, all acts and practices in violation of FDCPA are set forth in the Complaint.

15. State each and every fact in your possession which you believe supports the allegations set forth in Paragraph 47 of the Complaint, that "Despite Plaintiff's lawful request for removal of the disputed item pursuant to the FCRA, RRC failed to investigate Plaintiff's dispute and failed to remove the disputed item from Plaintiff's credit report."

ANSWER: Plaintiff disputed the account on several occasions with the Credit Reporting Agencies. Most recently was disputes in January and February of 2016, prior to those Plaintiff filed a dispute on November 11, 2015 with Experian. Experian reported on February 6, 2016 that it had investigated the dispute and the tradeline would remain.

16. State each and every fact in your possession which you believe supports the allegations set forth in Paragraph 48 of the Complaint, that "RRC did not evaluate or consider any of Plaintiff's information, claims, or evidence, and did not make any and/or sufficient attempts to remove the disputed item within a reasonable time following RRC's receipt of Plaintiff's dispute."

ANSWER: Plaintiff's bankruptcy filing is shown on her credit report, the original creditor, Home Federal Bank received notice, and the Home Federal Bank tradeline on both the Experian and Equifax reports stated that the debt was included in bankruptcy. Following the dispute on November 11, 2015 on February 6, 2016 Plaintiff was informed by Experian that the tradeline would remain.

17. Identify every person, collection agency, or company that has communicated with Plaintiff or attempted to communicate with Plaintiff regarding any alleged outstanding debt or account since 2011.

ANSWER: Objection. The Defendant has no right to the private information sought in this request. The private information is neither relevant to the fact that RRC violated federal and state law nor reasonably calculated to lead to the discovery of admissible evidence that would show whether it did or not, which is what this lawsuit is about. Further, this request is overly broad, and it is unduly burdensome for Plaintiff to locate and identify every person, collection agency, or company that has communicated with Plaintiff or attempted to communicate with Plaintiff regarding any alleged outstanding debt or account since 2011.

18. Describe or identify (or alternatively, produce) all documents that you contend or have reason to believe support any contention you raise in the Complaint.

ANSWER: See the documents produced by Plaintiff in response to RRC's Request for Production of Documents to Plaintiff.

19. Identify all person(s) with knowledge of the events, incidents and/or allegations described in the Complaint, with knowledge of the facts underlying the events, incidents and/or allegations described in the Complaint, or with discoverable information of any kind.

ANSWER: At this time, Plaintiff, Law Offices of Mayer & Newton, Shapiro & Kirsch, LLP, Knox County Register of Deeds, RRC, Buffaloe and Vallejo, PLC, Home Federal Bank, Chancery Court, U.S. Bankruptcy Court.

20. Identify by caption and case number any and/or all suits, lawsuits, actions, matters and/or legal proceedings of any kind or nature, civil or criminal, in which you have been a named party since 2006 and briefly state the subject matter, circumstances and outcome of each such suit, lawsuit, action, matter and/or legal proceeding.

ANSWER: Plaintiff has been a party to three lawsuits prior to this case.

(1) Home Federal Bank of Tennessee v. Pamela Clevenger Phibbs filed in the Knox County Circuit Court, December 23, 2015, case number 190820-1. See documents produced in response to Request No. 1.

(2) Pamela C. Phibbs v. AFNI, Inc., Case No. 3:16-cv-185 filed in the Eastern District of Tennessee, April 19, 2016. See documents produced in response to Request No. 1, specifically, copy of complaint, exhibits and Notice of Dismissal.

(3) Plaintiff is a class member of a lawsuit against Wyndham Hotels and Resorts, Case No. 3:13-cv-641 but has no documentation to produce besides documents produced in response to Request No. 1.

VERIFICATION OF ANSWERS TO INTERROGATORIES

Pursuant to 28 U.S.C. § 1746, Plaintiff Pamela C. Phibbs verifies under penalty of perjury that the foregoing responses to Defendant Revenue Recovery Corporation's First Set of Interrogatories to Plaintiff are true and correct.

Executed on: 10/13/16

By: ____________________
Pamela C. Phibbs

FOR PURPOSES OF OBJECTIONS

____
Brent S. Snyder, Esq., BPR #021700
2125 Middlebrook Pike
Knoxville, TN 37921
(865) 546-2141
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CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2016 a copy of the foregoing was mailed via U.S. mail first class, postage prepaid, to all parties listed below:

John M. Lawhorn, Esq.
P.O. Box 39
Knoxville, TN 37901-0039

s/ Brent S. Snyder
Brent S. Snyder, Attorney for Plaintiff